

FILED 28 JUN '23 16:53 USTC-DRP

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON**

EIDO HUSSAM AL-NAHHAS,
also known as Mohammad Al-Nahhas,
on behalf of Plaintiff and the class members
described below,

Plaintiff,

vs.

ROSEBUD LENDING LZO d/b/a ZocaLoans;
777 PARTNERS LLC;
TACTICAL MARKETING PARTNERS, LLC;
and JOHN DOES 1-20,

Defendants.

Misc. Action No.: 3:23-MC-535

Case No.: 1:22-cv-00750

U.S. District Court, Northern District
of Illinois

**PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA
DIRECTED TO NONPARTY FIRST REPUBLIC BANK**

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Plaintiff Eido Hussam Al-Nahhas ("Plaintiff") respectfully moves this Court for an order compelling First Republic Bank to comply with the third-party subpoena issued on April 18, 2023. Alternatively, this Court should enter an order holding First Republic Bank in contempt. Pursuant to Local Rule 7-1, Plaintiff has attempted to confer with First Republic Bank regarding its position with respect to this motion, but has not heard back. First Republic Bank has willfully refused to confer for the past week.

Dated: June 27, 2023

Respectfully submitted,

/s/ Matthew J. Goldstein

Matthew J. Goldstein, *pro hac vice* pending
ARDC #6339033

EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC

20 S. Clark Street, Suite 1500

Chicago, IL 60603-1824

(312) 739-4200

(312) 419-0379 (FAX)

mgoldstein@edcombs.com

CERTIFICATE OF SERVICE

I, Matthew J. Goldstein, hereby certify that on Tuesday, June 27, 2023, I caused a true and accurate copy of the foregoing document to be mailed to the Clerk of the United States District Court for the District of Oregon to be filed with the Court. I further certify that I sent a copy of this document to the following:

Jenni Perez
First Republic Bank
jeperez@firstrepublic.com

/s/ Matthew J. Goldstein
Matthew J. Goldstein

Matthew J. Goldstein, *pro hac vice pending*
EDELMAN, COMBS, LATTURNER
& GOODWIN, LLC
20 South Clark Street, Suite 1500
Chicago, IL 60603-1824
(312) 739-4200
(312) 419-0379 (FAX)
mgoldstein@edcombs.com
Email address for service: courtecl@edcombs.com